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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

TOM LEHMAN,

Plaintiff,

v.

MEDIALAB.AI, INC., a Delaware
corporation, OTIN HOLDINGS,
LLC, a Delaware limited liability
company, MICHAEL HEYWARD,
an individual, and DOES 1-10,
inclusive,

Defendants.

) Case No.: 2:23-cv-09055-CAS-JPRx

) **JUDGMENT**

) Complaint filed: October 26, 2023

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

WHEREAS, Plaintiff Tom Lehman (“Plaintiff”) and Defendants MediaLab.ai, Inc., Otin Holdings, LLC, and Michael Heyward (“Defendants”) (collectively, “the Parties”), resolved this matter by an Offer of Judgment Pursuant

1 to Fed. R. Civ. P. 68, for \$1,027,985.40, inclusive of all attorneys' fees and costs,
2 payable by Defendants to Plaintiff in twelve equal monthly installments starting
3 September 15, 2024, in exchange for the return of Plaintiff's 51,220 shares of
4 common stock of MediaLab.Ai, Inc. (the "Offer");

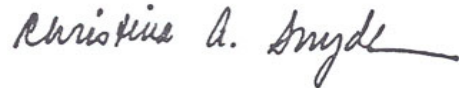
5 WHEREAS, on October 28, 2024, the Court held a hearing on Plaintiff's
6 request for entry of judgment. On the same day, the Court issued an Order
7 concluding the terms of the Federal Rule of Civil Procedure 68 Offer of Judgment
8 ("Offer") tendered by Defendants and accepted by Plaintiff were ambiguous and
9 determined the meaning of the Offer's terms. (Dkt. 66);

10 WHEREAS, on November 4, 2024, the Court ordered that the Judgment
11 should include language requiring Plaintiff to return his 51,220 MediaLab.Ai, Inc.
12 shares to MediaLab.Ai, Inc., or its designee, forthwith. (Dkt 70);

13 NOW, THEREFORE, the Court shall enter JUDGMENT in favor of Plaintiff
14 in the amount of \$1,027,985.40 (the "Judgment Amount") and against Defendants
15 as set out in the Fed. R. Civ. P. 68 Offer, to be effective only upon the return of
16 Plaintiff's 51,220 MediaLab.Ai, Inc. shares to MediaLab.Ai, Inc. or its designee.
17 The Judgment Amount is payable in twelve monthly installments, with the first
18 payment having been due on September 15, 2024. The Judgment Amount shall not
19 become due in full before September 15, 2025. This Judgment shall be valid to
20 enforce any unpaid amounts that become due hereunder within thirty (30) days
21 from the date it is entered by this Court, and no Defendant shall be deemed to be in

1 default of this Judgment until such time. The Judgment shall not take effect prior
2 to Plaintiff's return of his 51,220 MediaLab.Ai, Inc. shares to MediaLab.Ai, Inc.
3 or its designee.

4 IT IS SO **ORDERED** on this 9th day of December, 2024.

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7 Hon. Christina A. Snyder
8 United States District Judge
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1 I, Lilibet Behdadnia, hereby attest that all parties to this action, and on whose
2 behalf the filing is submitted, concur in the filing's content and have authorized the
3 filing.

4 Dated: December 9, 2024

/s/ Lilibet Behdadnia
Lilibet Behdadnia